

# AIR POLLUTION CONTROL DISTRICT OF JEFFERSON COUNTY, KENTUCKY TITLE V OPERATING PERMIT

Permit No.: 146-97-TV Plant ID: 0564

Effective Date: 10/03/2000 Expiration Date: 10/03/2005

UTM Northing: 4224.4 UTM Easting: 611.0

SIC: 4215 NAICS: 49211 AFS: 00564

Permission is hereby given by the Air Pollution Control District of Jefferson County to operate equipment located at:

United Parcel Service, Inc 911 Grade Lane Louisville, KY 40213

in accordance with the permit application on file with the District and under the conditions in the permit. This permit and the authorization to operate the emission units listed shall expire on midnight on the expiration date shown above. If a renewal permit is not issued prior to the expiration date, the owner or operator may continue to operate in accordance with the terms and conditions of this permit beyond the expiration date, provided that a complete renewal application is submitted to the District no earlier than eighteen (18) months and no later than one-hundred eighty (180) days prior to the expiration date.

Applicant for Permit: United Parcel Service Responsible Official: Joel Kolb
Title of Responsible Official: Air District Manager
Date Application Received: 17 March 1997
Date Application Administratively Complete: 13 June 1997
Date Public Notice Given: 25 June 2000

Reviewing Engineer (5)

Air Pollution Control Officer

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## **Abbreviations and Acronyms**

AC - Additional Condition AFS - Airs Facility Subsystem

AIRS - Aerometric Information Retrieval System

APCD - Air Pollution Control District
ASL - Adjusted Significant Level

atm - Atmosphere

BACT - Best Available Control Technology

Btu - British Thermal Unit °C - Degrees Centigrade

CEMS - Continuous Emission Monitoring System

CAAA - Clean Air Act Amendments (15 November 1990)

cf - Cubic foot

DOE - District Only Enforceable °F - Degrees Fahrenheit

gal - Gallon

HAP - Hazardous Air Pollutant

Hg - Mercury
hr - hour
lbs - Pounds
l - Liter

MACT - Maximum Achievable Control Technology

m - Meter mg - Milligram mm - Millimeter MM - Million

MOCS - Management of Change System

NAICS - North American Industry Classification System

NSR - New Source Review NO<sub>v</sub> - Nitrogen oxides

NSPS - New Source Performance Standards

PM - Particulate Matter

PM<sub>10</sub> - Particulate matter less than 10 microns

ppm - Parts per million

PSD - Prevention of Significant Deterioration

PMP - Preventive Maintenance Plan psia - Pounds per square inch absolute

RACT - Reasonably Available Control Technology

SIC - Standard Industrial Classification

SIP - State Implementation Plan

SO<sub>2</sub> - Sulfur dioxide

TAL - Threshold Ambient LimitTAP - Toxic Air Pollutant

tpy - Tons per year

VOC - Volatile Organic Compound

#### **Preamble**

Title V of the Clean Air Act Amendments of 1990 required EPA to create an operating permit program for implementation by state or local air permitting authorities. The purposes of this program are (1) to require an affected company to assume full responsibility for demonstrating compliance with applicable regulations; (2) to capture all of the regulatory information pertaining to an affected company in a single document; and (3) to make permits more consistent with each other.

A company is subject to the Title V program if it meets any of several criteria related to the nature or amount of its emissions. The Title V operating permit specifies what the affected company is, how it may operate, what its applicable regulations are, how it will demonstrate compliance, and what is required if compliance is not achieved. In Jefferson County, Kentucky, the Air Pollution Control District (APCDJC) is responsible for issuing Title V permits to affected companies and enforcing local regulations and delegated federal and state regulations. EPA may enforce federal regulations but not "District Only Enforceable Regulations".

Title V offers the public an opportunity to review and comment on a company's draft permit. It is intended to help the public understand the company's compliance responsibility under the Clean Air Act. Additionally, the Title V process provides a mechanism to incorporate new applicable requirements. Such requirements are available to the public for review and comment before they are adopted.

Title V Permit general conditions define requirements which are generally applicable to all Title V companies under the jurisdiction of APCDJC. This avoids repeating these requirements in every section of the company's Title V permit. Company-specific conditions augment the general conditions as necessary; these appear in the sections of the permit addressing individual emission units or emission points.

The general conditions include references to regulatory requirements that may not currently apply to the company, but which provide guidance for potential changes at the company or in the regulations during the life of the permit. Such requirements may become applicable if the company makes certain modifications or a new applicable requirement is adopted.

When the applicability of a section or subpart of a regulation is unclear, a clarifying citation will be made in the company's Title V permit at the emission unit/point level. Comments may also be added at the emission unit/point level to give further clarification or explanation.

The source's Title V permit may include a list of "insignificant activities," which are activities or processes falling into the general categories defined in Regulation 2.02, Section 2, and not associated with a specific operation or process for which there is a specific regulation. Activities so identified may be insignificant with regard to application disclosure requirements but may still have generally applicable requirements that continue to apply and must be included in the Title V operating permit. No periodic monitoring shall be required for facilities designated as insignificant activities.

#### **General Conditions**

- 1. <u>Compliance</u> The owner or operator shall comply with all applicable requirements and with all terms and conditions of this permit. Any noncompliance shall constitute a violation of the Act, State and District regulations and shall cause the source to be subject to enforcement actions including, but not limited to, the termination, revocation and reissuance, or revision of this permit, or denial of a permit application to renew this permit. Notwithstanding any other provision in the Jefferson County portion of the Kentucky SIP approved by EPA, any credible evidence may be used for the purpose of establishing whether the owner or operator is in compliance with, has violated, or is in violation of any such plan. (Regulation 2.16, sections 4.1.3, 4.1.13.1 and 4.1.13.7)
- 2. <u>Compliance Certification</u> The owner or operator shall certify, annually or more frequently if required in applicable regulations, compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. This certification shall meet the requirements of Regulation 2.16, sections 3.5.11 and 4.3.5. The owner or operator shall submit the annual compliance certification directly to the following address as well as to the District, as set forth in Regulation 2.16, section 4.3.5.4:

US EPA - Region IV Air Enforcement Branch Atlanta Federal Center 61 Forsyth Street Atlanta, GA 30303-8960

- 3. <u>Compliance Schedule</u> A compliance schedule must meet the requirements of Regulation 2.16, section 3.5.9.5. The owner or operator shall submit a schedule of compliance for each emission unit that is not in compliance with all applicable requirements. A schedule of compliance shall be supplemental to, and shall not condone noncompliance with, the applicable requirements on which it is based. For each schedule of compliance, the owner or operator shall submit certified progress reports at least semi-annually, or at a more frequent period if specified in an applicable requirement or by the District in accordance with Regulation 2.16 section 4.3.4. The progress reports shall contain:
  - a. Dates for achieving the activities, milestones, or compliance required in the schedule of compliance, and dates when activities, milestones, or compliance were achieved.
  - b. An explanation of why dates in the schedule of compliance were not or will not be met, and preventive or corrective measures adopted.
- 4. **<u>Duty to Supplement or Correct Application</u>** If the owner or operator fails to submit relevant facts or has submitted incorrect information in the permit application, it shall, upon discovery of the occurrence, promptly submit the supplementary facts or corrected information in accordance with Regulation 2.16, section 3.4.

# 5. <u>Emergency Provision</u>

- a. An emergency shall constitute an affirmative defense to an enforcement action brought for noncompliance with technology-based emission limitations. The affirmative defense of emergency shall be demonstrated through properly signed, contemporaneous operating logs, or other relevant evidence that:
  - i. An emergency occurred and that the owner or operator can identify the cause of the emergency.
  - ii. The permitted facility was at the time being properly operated.
  - iii. During the period of the emergency the owner or operator expeditiously took all reasonable steps, consistent with safe operating practices, to minimize levels of emissions that exceeded the emission standards or other requirements in this permit.
  - iv. The owner or operator submitted notice meeting the requirements of Regulation 1.07 of the time when emissions limitations were exceeded because of the emergency. This notice must fulfill the requirement of this condition, and must contain a description of the emergency, any steps taken to mitigate emissions, and any corrective actions taken.
- b. In an enforcement proceeding, the owner or operator seeking to establish the occurrence of an emergency has the burden of proof.
- c. This condition is in addition to any emergency or upset provision contained in an applicable requirement.

(Regulation 2.16, sections 4.7.1 through 4.7.4)

- 6. <u>Emission Fees Payment Requirements</u> The owner or operator shall pay annual emission fees in accordance with Regulation 2.08. Failure to pay the emissions fees when due shall constitute a violation of District Regulations. Such failure is subject to penalties and an increase in the fee of an additional 5% per month up to a maximum of 25% of the original amount due. In addition, failure to pay emissions fees within 60 days of the due date shall automatically suspend this permit to operate until the fee is paid or a schedule for payment acceptable to the District has been established. (Regulation 2.08, section 1.3)
- 7. <u>Emission Offset Requirements</u> The owner or operator shall comply with the requirements of Regulation 2.04.
- 8. <u>Enforceability Requirements</u> Except for the conditions that are specifically designated as "District Only Enforceable Conditions", all terms and conditions of this permit, including any provisions designed to limit a source's potential to emit, are enforceable by EPA and citizens as specified under the Act. (Regulation 2.16, sections 4.2.1 and 4.2.2)

## 9. **Enforcement Action Defense**

- a. It shall not be a defense for the owner or operator in an enforcement action that it would have been necessary for the owner or operator to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.
- b. The owner or operator's failure to halt or reduce activity may be a mitigating factor in assessing penalties for noncompliance if the health, safety or environmental impacts of halting or reducing operations would be more serious than the impacts of continued operation.

(Regulation 2.16, sections 4.1.13.2 and 4.1.13.3)

- 10. <u>Hazardous Air Pollutants and Sources Categories</u> The owner or operator shall comply with the applicable requirements of Regulations 5.02 and 5.14.
- 11. <u>Information Requests</u> The owner or operator shall furnish to the District, within a reasonable time, information requested in writing by the District, to determine whether cause exists for revising, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. The owner or operator shall also furnish, upon request, copies of records required to be kept by this permit. (Regulation 2.16, section 4.1.13.6) If information is submitted to the District under a claim of confidentiality, the source shall submit a copy of the confidential information directly to EPA. (Regulation 2.07, section 10.2)
- 12. <u>Insignificant Activities</u> The owner or operator shall notify the District in a timely manner of any proposed change to an insignificant activity that would require a permit revision. (Regulation 2.16, section 5)
- 13. <u>Inspection and Entry</u> Upon presentation of credentials and other documents as required by law, the owner or operator shall allow the District or an authorized representative to perform the following during reasonable hours:
  - a. Enter the premises to inspect any emissions-related activity or records required in this permit.
  - b. Have access to and copy records required by this permit.
  - c. Inspect facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required by this permit.
  - d. Sample or monitor substances or parameters to assure compliance with this permit or any applicable requirements.
     (Regulation 2.16, section 4.3.2)
- 14. Monitoring and Related Record keeping and Reporting Requirements The owner or operator shall comply with the requirements of Regulation 2.16, section 4.1.9. The owner or operator shall submit all required monitoring reports at least once every six months, unless more frequent reporting is required by an applicable requirement. The reporting period shall be January 1st through June 30th and July 1st through December 31st of each calendar year. All reports shall be postmarked by the 60th day following the end of each reporting period.

If surrogate operating parameters are monitored and recorded in lieu of emission monitoring, then an exceedance of multiple parameters may be deemed a single violation by the District for enforcement purposes.

- 15. <u>Off-permit Documents</u> Any applicable requirements, including emission limitations, control technology requirements, or work practice standards, contained in an off-permit document cannot be changed without undergoing the permit revision procedures in Regulation 2.16, Section 5. (Regulation 2.16, section 4.1.5)
- 16. **Operational Flexibility** The owner or operator may make changes without permit revision in accordance with Regulation 2.16, section 5.8.
- 17. **Permit Amendments (Administrative)** This permit can be administratively amended by the District in accordance with Regulation 2.16, sections 2.3 and 5.4.
- 18. **Permit Application Submittal** The owner or operator shall submit a timely and complete application for permit renewal or significant revision. If the owner or operator submits a timely and complete application then the owner or operator's failure to have a permit is not a violation until the District takes formal action on this permit application. This protection shall cease to apply if, subsequent to completeness determination, the owner or operator fails to submit, by the deadline specified in writing by the District, additional information required to process the application as required by Regulation 2.16, sections 3 and 5.2.
- 19. **Permit Duration** This permit is issued for a fixed term of 5 years, in accordance with Regulation 2.16, section 4.1.8.3.
- 20. <u>Permit Renewal, Expiration and Application</u> Permit renewal, expiration and application procedural requirements shall be in accordance with Regulation 2.16, sections 4.1.8.2 and 5.3. This permit may only be renewed in accordance with section 5.3.
- 21. **Permit Revisions** No permit revision shall be required under any approved economic incentives, marketable permits, emissions trading and other similar programs or processes for changes that are provided for in the permit. (Regulation 2.16, section 4.1.16)
- 22. **Permit Revision Procedures (Minor)** Except as provided in 40 CFR Part 72, the Acid Rain Program, this permit may be revised in accordance with Regulation 2.16, section 5.5.
- 23. **Permit Revision Procedures (Significant)** A source seeking to make a significant permit revision shall meet all the Title V requirements for permit applications, issuance and renewal, in accordance with Regulation 2.16, section 5.7, and all other applicable District Regulations.
- 24. **Permit Revocation and Termination by the District** The District may terminate this permit only upon written request of the owner or operator. The District may revoke a permit for cause, in accordance with Regulation 2.16, section 5.11.1.1 through 5.11.1.5. For purposes of Section 5, substantial or unresolved noncompliance includes, but is not limited to:

- a. Knowingly operating process or air pollution control equipment in a manner not allowed by an applicable requirement or that results in excess emissions of a regulated air pollutant that would endanger the public or the environment.
- b. Failure or neglect to furnish information, analyses, plans, or specifications required by the District.
- c. Knowingly making any false statement in any permit application.
- d. Noncompliance with Regulation 1.07, section 4.2; or
- e. Noncompliance with KRS Chapter 77.
- 25. **Permit Shield** The permit shield shall apply in accordance with Regulation 2.16, section 4.6.1.
- 26. **Prevention of Significant Deterioration of Air Quality** The owner or operator shall comply with the requirements of Regulation 2.05.
- 27. **Property Rights** This permit shall not convey property rights of any sort or grant exclusive privileges in accordance with Regulation 2.16, section 4.1.13.5.
- 28. <u>Public Participation</u> Except for modifications qualifying for administrative permit amendments or minor permit revision procedures, all permit proceedings shall meet the requirements of Regulations 2.07, Section 1; and 2.16, sections 5.1.1.2 and 5.5.4.
- 29. **Reopening For Cause** This permit shall be reopened and revised by the District in accordance with Regulation 2.16 section 5.9.
- 30. **Reopening for Cause by EPA** This permit may be revised, revoked and reissued or terminated for cause by EPA in accordance with Regulation 2.16 section 5.10.
- 31. **Risk Management Plan (112(r))** For each process subject to Section 112(r) of the Act, the owner or operator shall comply with 40 CFR Part 68 and Regulation 5.15.
- 32. <u>Severability Clause</u> The conditions of this permit are severable. Therefore, if any condition of this permit, or the application of any condition of this permit to any specific circumstance, is determined to be invalid, the application of the condition in question to other circumstances, as well as the remainder of this permit's conditions, shall not be affected. (Regulation 2.16, section 4.1.12)
- 33. <u>Stack Height Considerations</u> The owner or operator shall comply with the requirements of Regulation 2.10.
- 34. <u>Startups, Shutdowns, and Malfunctions Requirements</u> The owner or operator shall comply with the requirements of Regulation 1.07.
- 35. Submittal of Reports, Data, Notifications, and Applications

a. Applications, reports, test data, monitoring data, compliance certifications, and any other document required by this permit as set forth in Regulation 2.16 sections 3.1, 3.4, 3.5, 4.1.13.6, 5.8.5 and 5.11.7 shall be submitted to:

Air Pollution Control District of Jefferson County 850 Barret Ave Louisville, KY 40204-1745

b. Documents which are specifically required to be submitted to EPA as set forth in Regulation 2.16 sections 3.3, and 5.8.5 shall be mailed to EPA at the following address:

US EPA - Region IV APTMD - 12th floor Atlanta Federal Center 61 Forsyth Street Atlanta, GA 30303-3104

36. Other Applicable Regulations - The owner or operator shall comply with all applicable requirements of the following regulations:

	FEDERALLY ENFORCEABLE REGULATIONS		
Regulation	Title		
1.01	General Application of Regulations and Standards		
1.02	Definitions		
1.03	Abbreviations and Acronyms		
1.04	Performance Tests		
1.05	Compliance with Emission Standards and Maintenance Requirements		
1.06	Source Self-Monitoring and Reporting		
1.07	Emissions During Startups, Shutdowns, Malfunctions, and Emergencies		
1.08	Administrative Procedures		
1.09	Prohibition of Air Pollution		
1.10	Circumvention		
1.11	Control of Open Burning		
1.14	Control of Fugitive Particulate Emissions		
2.01	General Application		
2.02	Air Pollution Regulation Requirements and Exemptions		
2.03	Permit Requirements - Non-Title V Construction and Operating Permits and Demolition/Renovation Permits		
2.07	Public Notification for Title V, PSD, and Offset Permits; SIP Revisions; and Use of Emission Reduction Credits		
2.09	Causes for Permit Suspension		

FEDERALLY ENFORCEABLE REGULATIONS		
Regulation	Title	
2.10	Stack Height Considerations	
2.11	Air Quality Model Usage	
2.16	Title V Operating Permits	
4.01	General Provisions for Emergency Episodes	
4.02	Episode Criteria	
4.03	General Abatement Requirements	
4.07	Episode Reporting Requirements	
5.01	General Provisions (for Hazardous Air Pollutants)	
5.03	Potential Hazardous Emissions	
6.01	General Provisions (for Existing Affected Facilities)	
6.02	Emission Monitoring for Existing Sources	
7.01	General Provisions (for New Affected Facilities)	

DISTRICT ONLY ENFORCEABLE REGULATIONS		
Regulation Title		
1.12	Control of Nuisances	
1.13	Control of Objectionable Odors in the Ambient Air	
2.08	2.08 Emissions Fees, Permit Fees, Permit Renewal Procedures, and Additional Program Fees	
8.03	Commuter Vehicle Testing Requirements	

**Emission Unit U1 Description**: Aircraft Parts Repair and Painting Operations in Hangar Area. Operations consist of a paint booth, composite repair booth/table, and the various other areas used for repairing and spot painting aircraft components.

# **Applicable Regulations:**

FEDERALLY ENFORCEABLE REGULATIONS		
Regulation	Title	Applicable Sections
7.08	Standards of Performance for New Process Operations	1, 2, 3.1, 3.2, 3.3 & 3.1.1
7.25	Standards of Performance for New Sources Using Volatile Organic Compounds	1, 2, 3.2, 3.3, 4.1, 4.2, 5.1 & 5.2
7.59	Standard of Performance for New Miscellaneous Metal Parts and Products Surface Coating Operations	1, 2, 3, 4, 5.1.5, 6 & 7 5.1.1

DISTRICT ONLY ENFORCEABLE REGULATIONS		
Regulation	Regulation Title Applicable Sections	
5.12	Standards of Performance for New or Modified Sources Emitting Toxic Air Pollutants	1 through 6
5.14	Hazardous Air Pollutants and Source Categories	1 and 2

# **Allowable Emissions**:

<b>Emission Pt</b>	Regulated Air Pollutant	Limit / Standard
E1	VOC	< 5 TPY, Regulation 7.59, section 3.3
	PM	2.34 lbs/hr, Regulation 7.08, section 3.3
	Opacity	< 20%, Regulation 7.08, section 3.1.1
	TAPs	See AC # 1.d.
E2	VOC	< 5 TPY, Regulation 7.25, section 3.3
	PM	2.34 lbs/hr, Regulation 7.08, section 3.3
	Opacity	< 20%, Regulation 7.08, section 3.1.1
	TAPs	See AC # 1.d

## **Components:**

<b>Emission Pt</b>	Description	Control ID	Stack ID
E1	Composite Parts Repair Booth / Table, installed in 1990	C1 Dry Filter Media for PM	S1
E2	Painting Operations in Hangar Area, installed in 1990	C2 Dry Filter Media for PM	S2

#### **Additional Conditions**

- 1. **Standards** (Regulation 2.16, section 4.1.1)
  - a. PM for Emission Point E1 (Regulation 7.08, Section 3.0)
    - i. Opacity Standard No person shall cause, suffer, allow or permit any continuous emission into the open air from a control device or stack associated with any affected facility that is equal to or greater than 20% opacity. (Section 3.2)
    - ii. Mass Emission Standard For emissions from a control device or stack, no person shall cause, suffer, allow or permit the emission into the open air of particulate matter from any affected facility that is in excess of the quantity specified in this permit as determined using Table 1 in Regulation 7.08. (Section 3.3)
  - b. PM for Emission Point E2 (Regulation 7.08, Section 3.0)
    - i. Opacity Standard No person shall cause, suffer, allow or permit any continuous emission into the open air from a control device or stack associated with any affected facility that is equal to or greater than 20% opacity. (Section 3.2)
    - ii. Mass Emission Standard For emissions from a control device or stack, no person shall cause, suffer, allow or permit the emission into the open air of particulate matter from any affected facility that is in excess of the quantity specified in this permit as determined using Table 1 in Regulation 7.08. (Section 3.3)
  - c. VOC (Regulation 7.25 and Regulation 7.59)
    - i. The owner or operator shall comply with the following requirements pursuant to Regulation 7.25, Section 3.0:
      - 1. The owner or operator shall not allow or cause the emissions of VOC from Emission Point E2 to exceed 5 tons per year.
      - 2. No owner or operator shall construct or operate an affected facility unless it is equipped with and utilizes best available control technology (BACT) as determined at the time of the construction permit review by the District. Emission rates in terms of pounds of VOCs per hour and/or work practice, equipment specifications, and/or raw material specifications shall be set out as

permit conditions on the construction and/or operating permits to insure compliance with this requirement.

- 3. Affected facilities permitted prior to December 16, 1987, that emit no more emissions than that permitted at such date shall be deemed to be in compliance.
- ii. The owner or operator shall comply with the following requirements pursuant to Regulation 7.59, Section 3.0:
  - 1. The owner or operator shall not allow or cause the emissions of VOC from Emission Point E1 to exceed 5 tons per year. (Regulation 7.59, section 5.2)

#### d. TAPs (Regulation 5.12)

i. The owner or operator shall not allow or cause the emissions of any TAP's to exceed the ASL value, unless modeling or a BACT analysis has been submitted and approved by the District.

# 2. **Monitoring** (Regulation 2.16, Section 4.1.9.1.2)

#### a. PM

- i. The owner or operator shall monitor and verify the presence of dry media filters in the paint spray booth.
- ii. Filter media must be kept in good operating condition, with the filters being replaced on a regular basis, or when it is determined to be necessary for adequate control of any PM from the overspray.
- iii. The owner or operator shall monitor compliance with the PM emission standard using the following calculation methodology:

 $E_{PM} = (W) (S)(C_A)(TE)(CE)/H_{OP}$ where:

W = Weight of one gallon of coating

S = % by wgt of solids

C<sub>A</sub> = Gallons of coating applied per month

TE = Transfer efficiency CE = Control efficiency

 $H_{OP} = #$  of operating hours per month

 $E_{PM}$  = Average Hourly PM emissions

# b. Opacity

i. For each PM emission point, the owner or operator shall conduct a weekly one (1) minute visible emission survey during normal operation and daylight hours. No more than four Emission Points shall be observed simultaneously.

- ii. For each PM emission point without observed visible emissions during twelve (12) consecutive operating weeks, the owner or operator may elect to conduct a monthly visible emissions survey.
- iii. At each PM emission point, where visible emissions are observed, the owner or operator shall initiate corrective action within 8 hours of the initial observation. If the visible emissions persist, the owner or operator shall perform a Method 9 for stack emissions or Method 22 fugitive emissions within 24 hours of the initial observation. If the opacity standard is exceeded, the owner or operator shall report the exceedance to the District, pursuant to Regulation 1.07 and take all practicable steps to eliminate the exceedance. Any Method 9 or Method 22 tests performed shall meet the requirements of 40 CFR Part 60, Appendix A. Subsequent visible emission surveys shall be conducted as specified in 2.b.i.
- iv. If an emission point is not being operated during the observation period, then no visible emission survey needs to be performed and a negative declaration may be entered in the record. The owner or operator shall maintain sufficient records to verify the emission point was not being operated.

## c. VOC

- i. The owner or operator shall monitor the monthly coating usage for Emission Points E1 and E2.
- ii. Additional compliance monitoring shall consist of the record keeping requirement specified in AC # 3.c.i.

#### d. TAPs

- i. Compliance monitoring shall consist of the record keeping requirement specified in AC # 3.d.i.
- 3. **Record Keeping** (Regulation 2.16, section 4.1.9.2)

#### a. PM

- i. The owner or operator shall maintain monthly records of the following information:
  - 1) The number of gallons of each coating type used;
  - 2) The identification of the coatings by name and the weight % of each solid;
  - 3) The number of operating hours each month; and
  - 4) The average hourly PM emissions as determined using the calculation methodology specified in AC # 2.a.iii.

## b. Opacity

i. The owner or operator shall maintain records of the results of all visible emission surveys and tests. The visible emission survey records shall include the date and time of the survey, the name of the person conducting the survey, and whether or not visible emissions were observed. Any correction actions resulting from 2. b. iii. above shall be documented and records made available to the District upon request.

#### c. VOC

- i. The owner or operator of an affected facility subject to this regulation shall maintain records of operations for each averaging period for the most recent two-year period. The records shall be made available to the District upon request. The records shall include, but not be limited to, the following:
  - 1) The regulation and section number applicable to the affected facility for which the records are being maintained,
  - 2) The application method,
  - 3) The amount and type of coatings (including catalyst and reducer for multicomponent coatings) and solvent (including exempt compounds) used at each point of application during the averaging period. The District may specifically authorize the usage record to reflect a period longer than the compliance averaging period, with the usage prorated for each compliance averaging period by a method approved by the District. In this case, the usage record period shall not exceed 1 calendar month,
  - 4) The VOC content as applied in each coating and solvent,
  - 5) The date, or usage record period, for each application of coating and solvent,
  - 6) The amount of surface preparation, clean-up, wash-up of solvent (including exempt compounds) used and the VOC content of each material used during the averaging period, and
  - 7) The monthly VOC emissions for Emission Point E1 and Emission Point E2.
- ii. The averaging period for determining compliance with the VOC standards specified in District regulation 7.59 shall be each calendar month for Emission Unit U1.

#### d. TAPS

i. The owner or operator shall comply with the following requirements to demonstrate ongoing compliance with Regulation 5.12. The owner or operator shall maintain a monthly records of coating usage, which includes the weight % of each TAP for each coating type applied and the number of operating hours for each operating day to demonstrate that the emission rates established during the initial compliance demonstration are not exceeded.

#### 4. **Reporting** (Regulation 2.16, Section 4.1.9.3)

#### a. PM

i. The owner or operator shall include, at a minimum, the following information

in the semi-annual compliance monitoring reports for Regulation 7.08:

- 1) Emission Unit ID number;
- 2) The beginning and ending date of the reporting period;
- 3) Identification of all periods of exceedances of the hourly PM emission limit including the quantity of excess emissions;
- 4) Reason for excess emissions whether process upset, control device; malfunction, other known causes, or unknown causes; and
- 5) Description of any maintenance performed on the Dry Media Filter system, or any corrective action taken.

#### b. Opacity

- i. The owner or operator shall include, at a minimum, the following information in the semi-annual compliance monitoring reports for opacity:
  - 1) Emission Unit/Point ID number;
  - 2) The beginning and ending date of the reporting period;
  - 3) The date, time and results of each visible emissions survey conducted that resulted in visible emissions being observed. If no visible emissions were observed during the reporting period, the owner or operator may submit a negative declaration;
  - 4) The date, time and results of each Method 9 or Method 22 conducted. If no Method 9 or Method 22 tests were performed during the reporting period, the owner or operator may submit a negative declaration; and
  - 5) Description of any corrective action taken pursuant to AC # 2.b.iii.

# c. VOC

- i. The owner or operator shall include, at a minimum, the following information in the semi-annual compliance monitoring reports of E2 for Regulation 7.25:
  - 1) Emission Unit ID number:
  - 2) The beginning and ending date of the reporting period; and
  - 3) The twelve consecutive month VOC emissions for each month of the reporting period.
- ii. The owner or operator shall include, at a minimum, the following information in the semi-annual compliance monitoring reports of E1 for Regulation 7.59:
  - 1) Emission Unit/Point ID number;
  - 2) The beginning and ending date of the reporting period; and
  - 3) The twelve consecutive month VOC emissions for each month of the reporting period.

**Emission Unit U3 Description**: Air Cargo and Ground Support Operations. Support building used for paint booth spray operations and other areas used for repairing and spot painting air ground support vehicles

# **Applicable Regulations:**

FEDERALLY ENFORCEABLE REGULATIONS		
Regulation Title Applicable Sections		
6.44	Standards of Performance for Existing Commercial Motor Vehicle and Mobile Equipment Refinishing Operations	1, 2, 4, 5, 6, 7 & 8
7.08	Standards of Performance for New Process Operations	1, 2, 3.1, 3.2, 3.3 3.1.1

DISTRICT ONLY ENFORCEABLE REGULATIONS		
Regulation	Title	Applicable Sections
5.12	Standards of Performance for New or Modified Sources Emitting Toxic Air Pollutants	1 through 6

## **Allowable Emissions:**

Regulated Air Pollutant	Limit/Standard
VOC	Regulation 6.44, section 4.0
PM	2.34 lbs/hr, Regulation 7.08, section 3.3
PM - Opacity	< 20%, Regulation 7.08, section 3.1.1
TAPs	See AC # 1.b

# **Components:**

<b>Emission Pt</b>	Description	Control ID	Stack ID
E4	Paint Spray Booth for Ground Support Vehicles, installed in 1988	C2 Dry Filter Media for PM	S2

## **Additional Conditions**

- 1. **Standards** (Regulation 2.16, section 4.1.1)
  - a. VOC (Regulation 6.44)
    - i. Any person applying coatings to Group i or Group II vehicles and equipment, including parts and components, repairing of partial collision damage or refinishing entire motor vehicles or mobile equipment, shall not apply materials that have a VOC content which exceeds the limits specified in this permit. Compliance with the VOC limits shall be based on VOC content, including any VOC material added

to the original coating supplied by the manufacturer, less water and exempt solvent, as applied to the surface that is being coated. Appendix A of Regulation 6.44 provides equations to calculate VOC content of coatings and compound coatings.

ii. Group i Vehicles: Group i vehicles, their parts and components, whether existing or replacement parts, shall not be refinished with a coating which has a VOC content in excess of the following limits.

Coating	VOC lb/gal
Pretreatment wash primer	6.5
Precoat	5.5
Primer/primer surfacer	4.8
Primer sealer	4.6
Topcoat	5.2
Metallic/iridescent topcoat	5.2
Extreme performance	6.2

iii. Group II Vehicles: Group II vehicles, or their existing parts and components, or replacement parts or components, shall not be refinished with a coating which has a VOC content in excess of the following limits.

Coating	VOC lb/gal
Pretreatment wash primer	6.5
Precoat	5.5
Primer/primer surfacer	2.8
Primer sealer	3.5
Topcoat	3.5
Metallic/iridescent topcoat	3.5
Extreme performance	6.2

- iv. The limitations of VOC content in sections 4.1 and 4.2 of Regulation 6.44 shall not be exceeded unless:
  - 1) Emissions are controlled to an equivalent level by air pollution control equipment,
  - 2) The efficiency of the control equipment is a minimum of 85%, and

- 3) The control equipment has been approved by the District and permits issued.
- v. Specialty coatings shall not be applied unless:
  - 1) The VOC content is equal to or less than 7.0 pounds of VOC per gallon of coating, as applied, and
  - 2) The application of all such coatings, except safety related coatings, shall not exceed 10% of all coatings applied, on a weekly basis.
- vi. Surface cleaners, consisting of general wiping cleaners, solvents, wax removers, grease removers, road-tar removers, mold-release agent removers, and other similar materials, must meet the following requirements:
  - 1) General purpose surface cleaners shall have a VOC content that does not exceed 1.7 pounds per gallon on and after May 1, 1995, and
  - 2) Any cleaner, solvent, or remover material may be used for specific, hard to clean surfaces provided that:
    - A) Material is dispensed from a hand-held spray bottle, and
    - B) Usage of the solvent or cleaner does not exceed 35% of the total monthly usage of all surface cleaners.

# iv. Equipment (Regulation 6.44, section 5.0)

- 1) The owner or operator shall use the following equipment:
  - A) Spraying operations shall be performed in an enclosed spray booth or an enclosed spray area which provides, as a minimum,
  - B) A series of exhaust filters, wet or dry, that have a 90% particulate control efficiency, and
  - C) Proper maintenance of the equipment in accordance with the manufacturer's recommendations or, in the absence of the above, reasonable care.
- 2) Spray coating operations involving small surface areas, typically called priming, prepping, burn-in and cut-in activities, may be performed in a dedicated spray area other than the spray booth pursuant to section 5.1 of Regulation 6.44. These dedicated areas must meet the following requirements:
  - A) The preparation area must be ventilated with sufficient airflow and reasonable capture of overspray to assure that the overspray is exhausted through a dedicated ventilation system.
  - B) The ventilation system shall capture and remove overspray from the area through a filtered exhaust as in section 5.1 of Regulation 6.44.
  - C) Dedicated areas may be site-constructed facilities, purchased units or portable units provided that the intent of a controlled and filtered exhaust system is accomplished.

- D) If the preparation area is equipped with a recirculation system rather than direct exhaust, the system must include a carbon adsorption system prior to recirculating the air back into the area. The carbon shall be changed at the manufacturer's recommended intervals to minimize solvent emissions.
- 3) All non-spray applied-coating operations shall be performed in a dedicated and ventilated area pursuant to section 5.1 or 5.2 of Regulation 6.44.
- 4) Spraying equipment shall have a minimum transfer efficiency of 65% at eight inches from the surface that is being coated. Compliance may be achieved by any of the following:
  - A) Electrostatic application equipment operated and maintained in accordance with the manufacturer's recommendations,
  - B) HVLP spray equipment operated and maintained in accordance with the manufacturer's recommendations, or
  - C) Any other coating application equipment which has been satisfactorily demonstrated to be capable of achieving a minimum of 65% efficiency and approved by the District.
  - D) VOC pollution control equipment, if required for compliance with Section 4, shall be appropriately installed, maintained and operated in accordance with the manufacturer's recommendations. The minimum efficiency of the control device shall be 85%.
- 6) Spray and other equipment cleanup shall be accomplished in an apparatus specifically designed to minimize evaporation of VOC materials to the atmosphere. Non-enclosed gun cleaners, etc. may be used provided that the vapor pressure of the cleaning solvent is less than 100 mmHg at 68°F and the used solvent is contained for subsequent disposal by authorized means.

## b. TAPs (Regulation 5.12)

i. The owner or operator shall not allow or cause the emissions of TAP's to exceed the ASL value, unless modeling or a BACT analysis has been submitted and approved by the District.

# c. PM (Regulation 6.09, Section 3)

- i. Opacity Standard No person shall cause, suffer, allow or permit any continuous emission into the open air from a control device or stack associated with any affected facility that is equal to or greater than 20% opacity. (Section 3.3)
- ii. Mass Emission Standard For emissions from a control device or stack, no person shall cause, suffer, allow or permit the emission into the open air of particulate matter from any affected facility that is in excess of the quantity specified in this permit as determined using Table 1 in Regulation 6.09. (Section 3.4)

## 2. **Monitoring** (Regulation 2.16, Section 4.1.9.1.2)

#### a. PM

- i. The owner or operator shall monitor and verify the presence of dry media filters in the paint spray booth.
- ii. Filter media must be kept in good operating condition, with the filters being replaced on a regular basis, or when it is determined to be necessary for adequate control of any PM from the overspray.
- iii. Additional compliance monitoring shall consist of the record keeping requirement specified in AC # 3.a.i.

## b. Opacity

- i. For each PM emission point, the owner or operator shall conduct a weekly one (1) minute visible emission survey during normal operation and daylight hours. No more than four Emission Points shall be observed simultaneously.
- ii. For each PM emission point without observed visible emissions during twelve (12) consecutive operating weeks, the owner or operator may elect to conduct a monthly visible emissions survey.
- iii. At each PM emission point, where visible emissions are observed, the owner or operator shall initiate corrective action within 8 hours of the initial observation. If the visible emissions persist, the owner or operator shall perform a Method 9 for stack emissions or Method 22 fugitive emissions within 24 hours of the initial observation. If the opacity standard is exceeded, the owner or operator shall report the exceedance to the District, pursuant to Regulation 1.07 and take all practicable steps to eliminate the exceedance. Any Method 9 or Method 22 tests performed shall meet the requirements of 40 CFR Part 60, Appendix A. Subsequent visible emission surveys shall be conducted as specified in 2.b.i.
- iv. If an emission point is not being operated during the observation period, then no visible emission survey needs to be performed and a negative declaration may be entered in the record. The owner or operator shall maintain sufficient records to verify the emission point was not being operated.

#### c. VOC

i. Compliance monitoring shall consist of the record keeping requirement specified in AC # 3.c.i.

#### d. TAPs

i. See AC# 3. d.

# 3. **Record Keeping** (Regulation 2.16, section 4.1.9.2)

#### a. PM

- i. The owner or operator shall maintain daily records, except as specifically noted, of the following information:
  - 1) The number of gallons of the coatings used for each operating day;
  - 2) The identification of the coatings by name and weight % of each solid;
  - 3) The number of operating hours for each operating day; and
  - 4) The hourly PM emissions.
- ii. The owner or operator may, as an alternative to AC # 3.a.i., submit a one time compliance demonstration that the uncontrolled potential PM emissions are below the allowable limit. Upon District approval of the one time compliance demonstration, the owner or operator will not be required to comply with AC # 3.a.i.

## b. Opacity

i. The owner or operator shall maintain records of the results of all visible emission surveys and tests. The visible emission survey records shall include the date and time of the survey, the name of the person conducting the survey, and whether or not visible emissions were observed. Any correction actions resulting from 2. b. iii. above shall be documented and records made available to the District upon request.

#### c. VOC

- i. The owner or operator shall comply with the following record keeping requirements to demonstrate ongoing compliance with Regulation 6.44:
  - 1) A current list of all coatings, solvents, reducers, additives, and any other VOC containing material in use at the facility. This list shall include, but is not limited to, the following information:
    - A) Name and appropriate identification of coating, catalyst, hardener, reducer, etc. used;
    - B) Mix ratio of components used, and
    - C) VOC content of coating, as applied, less water and excluded solvents, in pounds per gallon.
  - 2) Daily records that shall include:
    - A) Identification of applied coatings pursuant to section 8.1.1.1 of Regulation 6.44, and
    - B) Quantity of each coating applied.

- 3) Monthly records that shall include:
  - A) Type of solvent used for cleanup or surface preparation, and
  - B) Quantity of each solvent, cleaner, etc. used.
- 4) MSDS or other data sheets provided by the material manufacturer or its agent for each item listed pursuant to section 8.1.1 of Regulation 6.44 and shall include as a minimum:
  - A) Designation of VOC content as supplied, expressed in lbs/gal, less water and excluded solvents,
  - B) Designation of all hazardous and/or toxic components. Designation shall include, as a minimum: the CAS registration number of the component; the weight percent of the component; and the weight of the product, expressed in lbs/gal, or alternately, the specific gravity of the product, and
  - C) Other pertinent physical and chemical data necessary to determine compliance with District regulations.

#### d. TAPS

- i. The owner or operator shall maintain a daily record of coating usage, which includes the weight % of each TAP for each coating type applied and the number of operating hours for each operating day to demonstrate that the emission rates established during the initial compliance demonstration are not exceeded.
- 4. **Reporting** (Regulation 2.16, Section 4.1.9.3)

#### a. PM

- i. The owner or operator shall include, at a minimum, the following information in the semi-annual compliance monitoring reports for Regulation 6.09:
  - 1) Emission Unit ID number;
  - 2) The beginning and ending date of the reporting period;
  - 3) Identification of all periods of exceedances of the hourly PM emission limit including the quantity of excess emissions;
  - 4) Reason for excess emissions whether process upset, control device; malfunction, other known causes, or unknown causes; and
  - 5) Description of any corrective action taken.

# b. Opacity

- i. The owner or operator shall include, at a minimum, the following information in the semi-annual compliance monitoring reports for opacity:
  - 1) Emission Unit ID number and Stack ID number;
  - 2) The beginning and ending date of the reporting period;
  - 3) The date, time and results of each visible emissions survey conducted

- that resulted in visible emissions being observed. If no visible emissions were observed during the reporting period, the owner or operator may submit a negative declaration;
- 4) The date, time and results of each Method 9 or Method 22 conducted. If no Method 9 or Method 22 tests were performed during the reporting period, the owner or operator may submit a negative declaration; and
- 5) Description of any corrective action taken pursuant to AC # 2.b.iii.

#### c. VOC

- i. The owner or operator shall include, at a minimum, the following information in the semi-annual compliance monitoring reports for Regulation 6.44:
  - 1) Emission Unit ID number;
  - 2) The beginning and ending date of the reporting period;
  - 3) Identification of any noncompliant coatings used including the quantity of excess emissions; and
  - 4) Description of any corrective action taken.

## d. TAPs

There are no semi-annual compliance monitoring reports required under Regulation 5.12.

# Emission Unit U4 Description: Jet-A Fuel Loading, Storage and Dispensing Operations

# **Applicable Regulations**:

FEDERALLY ENFORCEABLE REGULATIONS			
Regulation Title Applicable Sections			
40CFR60, Subpart K <sub>b</sub>	Federal New Source Performance Standards for VOC Liquid Storage Vessels	60.113(b), 60.115(b) and 60.116(b)	
7.12	Standards of Performance for New Storage Vessels for Volatile Organic Compounds	1, 2, 3, 4, 5, 7 & 8	

DISTRICT ONLY ENFORCEABLE REGULATIONS			
Regulation	Title	Applicable Sections	
5.12	Standards of Performance for New or Modified Sources Emitting Toxic Air Pollutants	1 through 6	
5.14	Hazardous Air Pollutants and Source Categories	1 and 2	
7.02	Federal New Source Performance Standards Incorporated by Reference	1.21	

# **Allowable Emissions:**

Regulated Air Pollutant	Limit/Standard
VOC	See AC # 1.a.i
TAPs	See AC # 1.b.i

# **Components**:

<b>Emission Pt</b>	Description	Control ID
E6	Jet-A Fuel Tank, installed in 1985	Internal, Floating Roof
E7	Jet-A Fuel Tank, installed in 1983	Internal, Floating Roof
E8	Jet-A Fuel Recovery Tank, installed in 1994	Uncontrolled
E9	Jet-A Fuel Dispensing, installed in 1983	Uncontrolled

#### **Additional Conditions**

- 1. **Standards** (Regulation 2.16, section 4.1.1)
  - a. VOC (Regulation 7.12, Section 3)
    - i. Jet-A fuel has a vapor pressure less that 1.5 psia, therefore, Emission Unit U4 is not currently subject to any emission or equipment standards.
  - b. TAPs (Regulation 5.11)
    - i. The owner or operator shall not allow or cause the emissions of TAP's to exceed the ASL value, unless modeling or a RACT analysis has been submitted and approved by the District.
- 2. **Monitoring** (Regulation 2.16, Section 4.1.9.1.2)
  - a. VOC
    - i. Compliance monitoring shall consist of the record keeping requirement specified in AC # 3.a.i.
  - b. TAPs
    - i. Compliance monitoring shall consist of the record keeping requirement specified in AC # 3.a.i.
- 3. **Record Keeping** (Regulation 2.16, section 4.1.9.2)
  - a. VOC/TAP
    - i. The owner or operator shall maintain records of each VOC material stored and product throughput to demonstrate ongoing compliance.
- 4. **Reporting** (Regulation 2.16, Section 4.1.9.3)
  - a. VOC/TAP

There are no semi-annual compliance monitoring reports required for Emission Unit U4.

**Emission Unit U5 Description**: Gasoline and Diesel Fuel Usage - Loading, Storage and Dispensing Operations - Service Station Operations for Commercial Refueling

# **Applicable Regulations:**

FEDERALLY ENFORCEABLE REGULATIONS			
Regulation	Title	Applicable Sections	
6.40	Standards of Performance for Gasoline Transfer to Motor Vehicles (Stage II Vapor Recovery and Control)	1.1, 2, 3, 4, 5, 6, 7, 8, 9, 10 & 11	
40CFR60, Subpart K <sub>b</sub>	Federal New Source Performance Standards for VOC Liquid Storage Vessels	60.116(b)	
7.12	Standards of Performance for New Storage Vessels for Volatile Organic Compounds	1, 2, 3, 4, 5, 7 & 8	
7.15	Standards of Performance for Gasoline Transfer to New Service Station Storage Tanks (Stage I Vapor Recovery)	1, 2 & 3	

DISTRICT ONLY ENFORCEABLE REGULATIONS			
Regulation	Title	Applicable Sections	
5.12	Standards of Performance for New or Modified Sources Emitting Toxic Air Pollutants	1 through 6	
5.14	Hazardous Air Pollutants and Source Categories	1 and 2	
7.02	Federal New Source Performance Standards Incorporated by Reference	1.21	

# **Allowable Emissions:**

Regulated Air Pollutant	Limit/Standard
VOC	See AC # 1.a. and 1.b.
TAPs	See AC # 1.c.
HAPs	< 10 TPY

# **Components**:

<b>Emission Pt</b>	Description	Applicable Reg.	Control ID
E10	Ashbottom Hub - Gas Tank, installed in 1993	7.15	Stage I
E11	Ashbottom Hub - Diesel Tank, installed in 1993	7.12, 40CFR60, Subpart K <sub>b</sub>	Stage I
E12	Grade Lane Hub - Gas Tank, installed in 1993	7.15	Stage I

<b>Emission Pt</b>	Description	Applicable Reg.	Control ID
E13	New Diesel Tank, installed in 1997	7.12 & 40 CFR 60, Subpart Kb	Stage I
E14	Gasoline Fuel Dispensing, installed in 1993	6.40	Stage II
E15	Diesel Fuel Dispensing, installed in 1993	7.12 & 40 CFR 60, Subpart Kb	Stage I

#### **Control Devices:**

Gasoline storage tanks are equipped with Stage I		
Gasoline dispensing system is equipped as Stage II vapor recovery devices		
Diesel tanks are equipped with Stage I vapor recovery devices		

#### **Additional Conditions**

- 1. **Standards** (Regulation 2.16, section 4.1.1)
  - a. VOC (Regulation 6.40 and Executive Order for CARB # G-70-52-AM)
    - i. Standard for gasoline dispensing facilities
      - 1) No owner or operator of an existing gasoline dispensing facility and or any new or modified facility shall install, permit the use of, or allow the transfer of gasoline from a gasoline dispensing unit, which is not equipped with a certified Stage II vapor recovery and control system, to a motor vehicle fuel tank. The vapor recovery and control system must be CARB certified and also verified by the District using the procedures outlined in this regulation.
      - 2) All systems shall be maintained in good working order in accordance with the manufacturer's plans, specifications, maintenance requirements, and certification.
      - 3) No elements or components of a vapor recovery and control system shall be modified, removed, replaced, or otherwise rendered inoperative in any manner which would prevent the system from performing in accordance with its certification requirements.
      - 4) An owner or operator having a vapor recovery and control system installed in a gasoline dispensing facility shall ensure that at least one person, designated as a representative for that facility, receives adequate training and instruction in the operation and maintenance of the certified vapor recovery and control system. This training procedure will cover specific topics outlined in Section 9 of Regulation 6.40.

- 5) An owner or operator having a vapor recovery and control system shall ensure that at least once during every 24 hour period for which the system was in operation during that day a trained representative, designated for that affected facility, must visually inspect the equipment for defects in accordance with Section 6 of Regulation 6.40. An inspection report shall be made every 24 hours recording deficiencies, repairs or maintenance on the vapor recovery and control system. This 24 hour inspection cycle is subject to audit by the District. The inspection reports must be recorded in a nonfalsifiable format that can be verified by the District. The Record keeping shall be made available to the District within three days, upon request.
- 6) No vapor recovery and control system shall be installed, used, or maintained unless the system has been certified and tested.

## ii. Stage II Certification Requirements

1) It shall be the responsibility of the supplier/manufacturer to provide proof to the District that the vapor recovery and control system or modifications meet certification. The vapor recovery and control system must be a certified CARB system, which has been previously tested and approved by CARB, having been assigned an executive order and a vapor recovery or removal efficiency of at least 95% by weight of gasoline vapors displaced during the dispensing of gasoline.

## iii. Stage II System Equipment Requirements

- 1) Only equipment that shall be used in a certified vapor recovery and control system is equipment which conforms with the certification for that system.
- 2) Only coaxial nozzles and hoses shall be installed on balance systems to dispense gasoline and recover the gasoline vapor.
- 3) Vapor risers, for balance systems and balanced assist systems, shall be one inch inside diameter galvanized pipe or larger if two or more nozzles feed into them.
- 4) All rubber hosed vapor connectors (riser-to-dispenser) shall be UL approved for gasoline transmission.
- 5) Only equipment manufactured or rebuilt by the original manufacturer or rebuilder certified by CARB may be used in the vapor recovery and control system. The certified equipment shall be identified with the name of the certified manufacturer or certified rebuilder permanently affixed to it.
- 6) Any assist system using a processing unit shall be installed in a safe and accessible location for compliance inspections.
- 7) No person shall refuse the right of an inspector from the District to perform an inspection of the stage II vapor recovery and control system, including inspection of internal dispenser piping, processing units, and all related equipment upon request.

8) No remote vapor check valves or associated equipment shall be used for operating equipment on any vapor balance recovery or Hirt vacuum assist systems.

#### iv. Equipment Maintenance

- 1) The vapor recovery and control system shall be kept operating in accordance with the manufacturer's specifications and maintained to be leak free, vapor tight, and in good working order. The equipment shall be operated and maintained with none of the following defects:
  - A) Absence or disconnection of any component required to be used in the system as certified by CARB,
  - B) A vapor hose which is crimped or flattened in any manner that will constrict the flow of vapors in the vapor return line and/or a vapor hose which has cuts, tears, and/or disconnection of inner spring from hose end fitting. The pressure drop through the vapor hose shall not exceed by a factor of two or more the value specified for that certified system,
  - C) A nozzle boot which is torn in one or more of the following manners:
    - i. Triangular-shaped or similar tear ½-inch or greater to a side, or hole ½ inch or greater in diameter, or
    - ii. Slit 1-inch or greater in length,
  - D) A faceplate or flexible cone which is damaged in the following manner:
    - i. For balance system nozzles and for nozzles on aspirator assist type systems, damage shall be defined as the inability to achieve a seal with a fill pipe interface over 1/4 of the circumference of the faceplate (accumulated). This includes tears, cuts and irregularities caused by age or use, or
    - ii. For vacuum assist type nozzles, greater than 1/4 of the flexible cone missing,
  - E) Nozzle shut-off mechanisms which malfunction in any manner,
  - F) A vapor return line, including such components as swivels, anti-recirculation valves and underground piping, that malfunction or are blocked, cracked, crimped, trapped or are restricted such that the pressure drop through the line exceeds by a factor of two or more the value specified in that certified system,
  - G) A vapor processing device which is inoperative or malfunctioning,
  - H) A vacuum producing device which is inoperative or malfunctioning,
  - i) Pressure/vacuum relief valves, vapor check valves, or dry brakes which are inoperative,

- J) Any equipment defect which is identified in a CARB system certification as substantially impairing the effectiveness of the system in reducing the emission of air contaminants,
- K) Any improper or non-CARB certified equipment or components, and
- L) The owner or operator of each gasoline dispensing facility, subject to section 1.1, shall conspicuously post operating instructions on the front of each gasoline dispenser connected to the stage II vapor recovery and control system. A toll-free telephone number shall be posted for the public to report any problems experienced with the system. The instructions shall be clearly visible to the public at any normal refueling position and be in good repair at all times. The instructions shall also clearly describe how to refuel vehicles correctly with the vapor recovery nozzles and include a warning to not attempt continued refueling after automatic shut-off of the system (an indication that the vehicle fuel tank is full).
- 2) Upon identification of any defects described in section 6.1 of Regulation 6.40, the owner or operator shall ensure that all gasoline dispensing equipment for which vapor recovery has been impaired must be tagged "Out of Service". The tagged equipment shall be rendered inoperable and the tags shall not be removed until the defective equipment has been repaired, replaced or adjusted to permit proper operation, as described in section 3.2.
- 3) In the case of defects identified by the District, tagged equipment shall be rendered inoperable and the tags shall not be removed until:
  - A) The District has been notified of the repairs, and
  - B) The tagged equipment has been inspected and/or the District has authorized its use pending re-inspection.
- 4) If a District inspector determines that a component is not in good working order, but does not contain a defect pursuant to section 6.1, the District shall provide the owner or operator with a notice specifying the basis on which the component is not in good working order. If within 15 days the owner or operator provides the District with adequate evidence that the component is in good working order, the owner or operator shall not be considered in non-compliance under this section.

#### b. VOC (Regulation 7.15)

- i. The owner or operator shall comply with the applicable requirements specified in District Regulation 7.15 (Regulation 7.15)
  - 1) The owner or operator of an affected facility shall install, maintain, and operate the following devices on the storage tanks:
    - A) Submerged fill pipe;

- B) If the gasoline storage tank is equipped with a separate gauge well, a gauge well drop tube shall be installed which extends to within six inches of the bottom of the tank;
- C) Vent line restrictions on the affected facility; and
- D) Vapor balance system and vapor tight connections on the liquid fill and vapor return hoses. The cross-sectional area of the vapor return hose and any other vapor return passages in the circuit connecting the vapor space in the service station tank to that of the truck tank must be at least 50% of the liquid fill hose cross-sectional area for each tank and free of flow restrictions to achieve acceptable recovery. The vapor balance equipment must be maintained according to the manufacturer's specifications. The type, size and design of the vapor balance system are subject to the approval of the District.
- 2) The owner or operator may elect to use an alternate control system provided it can be demonstrated to the District's satisfaction to achieve an equivalent control efficiency.
- 3) The owner or operator shall not allow delivery of fuel to the storage tanks until the vapor balance system is properly connected to the transport vehicle and the affected facility.
- 4) No person shall deliver gasoline to a service station without connecting the vapor return hose between the tank of the delivery truck and the storage tank receiving the product. The vapor balance system must be operating in accordance with the manufacturer's specifications.
- 5) Opening of a truck tank hatch for the purpose of visual inspection is permitted for a period not to exceed one minute and only after pumping from that compartment has stopped for at least three minutes prior to the opening. All truck tank hatches must be closed during pumping.
- 6) Except for above ground tank filling, all lines must be gravity drained in such a manner that upon disconnect no liquid spillage would be expected.
- 7) Above ground tanks shall be equipped with dry breaks with any liquid spillage upon the line disconnect not exceeding 10 ml.
- 8) Equipment subject to this section shall be operated and maintained with no defects and:
  - A) All fill tubes shall be equipped with vapor-tight covers including gaskets,
  - B) All dry breaks shall have vapor-tight seals and shall be equipped with vapor-tight covers or dust covers,
  - C) All vapor return passages shall be operated so there can be no obstruction of vapor passage from the storage tank back to the delivery vehicle,
  - D) All storage tank vapor return pipes and fill pipes without dry breaks shall be equipped with vapor-tight covers including gaskets, and
  - E) All hoses, fittings, and couplings shall be in a vapor-tight condition.

#### c. TAPs

i. The owner or operator shall not allow the emissions of any TAP to exceed the ASL value specified in Regulation 5.12, unless modeling or a BACT analysis is performed and submitted to the District for approval.

#### d. HAPs

i. The owner or operator shall not allow or cause the plant-wide emissions of any single HAP to equal or exceed 10 tons per year or any combination of HAPs to equal or exceed 25 tons per year.

# 2. **Monitoring** (Regulation 7.12, Section 5.0)

- a. VOC
  - i. The owner or operator shall demonstrate compliance with the requirements of Monitoring of Operations for Regulation 7.12, Section 5.0:
    - The true vapor pressure shall be determined by using the average monthly storage temperature and typical Reid vapor pressure of the contained liquid or from typical available data on the contained liquid. Supporting analytical data shall be requested by the District if there is a question on the values reported.
  - ii. Additional compliance monitoring shall consist of the record keeping requirement specified in AC # 3.a.i.
- b. TAPs
  - i. See AC# 3.b.
- 3. **Record Keeping** (Regulation 2.16, section 4.1.9.2)
  - a. VOC
    - i. The owner or operator shall comply with the record keeping requirements specified in Section 10 of Regulation 6.40.
  - b. TAPS
    - i. The owner or operator shall maintain records of the monthly throughput of gasoline.
- 4. **Reporting** (Regulation, section 4.1.9.3)
  - a. VOC/TAP
    - i. There are no semi-annual compliance monitoring reports required.

- b. Control Devices (Stage I and Stage II Vapor Control)
  - i. The owner or operator shall include, at a minimum, the following information in the semi-annual compliance monitoring reports for the Vapor Control devices:
    - 1) Emission Unit ID number and Control ID number;
    - 2) The beginning and ending date of the reporting period;
    - 3) Identification of the operating parameter being monitored to demonstrate ongoing compliance;
    - 4) Identification of all periods of control device bypassing or downtime;
    - 5) Summary information on the number, duration and cause of all excursions. (Excursion is defined as any departure from the performance indicator range); and
    - 6) Description of the corrective action taken for each excursion.

**Emission Unit U6a Description**: Emergency Diesel-fueled Backup Power Generators

#### **Allowable Emissions:**

Regulated Air Pollutant	Limit/Standard	
$NO_x$	See AC # 1.a.	
Opacity	< 20%	

## **Components:**

<b>Emission Pt</b>	Description	Control ID
E16	2,584 Hp Power Generator, installed in 1988	Uncontrolled
E17	2,584 Hp Power Generator, installed in 1988	
E18	2,584 Hp Power Generator, installed in 1988	
E19	2,584 Hp Power Generator, installed in 1988	
E20	2,584 Hp Power Generator, installed in 1997	

#### **Additional Conditions**

- 1. **Standards** (Regulation 2.16, section 4.1.1)
  - a. NO<sub>x</sub>
    - i. The owner or operator shall not allow or cause the emissions of NO<sub>x</sub> to exceed 248 tons per year in order to avoid being subject to the requirements of Regulation 2.04. An emission factor of 81.8 lbs/hr for NO<sub>x</sub> shall be used for each generator.

# 2. **Operational Limits**

- a. The operation of these five (5) power units have been designated for "Emergency" purposes only as defined below, which will include the periodic operation and maintenance (O&M) of the units on a specified rotational basis for the units. The O&M operation will assure satisfactory operational status of the units for stand-by readiness status.
  - i. The generators will be operated during emergency events only. "Emergency" is defined as follows:
    - 1) Periods where electric power to the facility is interrupted, for any reason;
    - 2) Periods where electricity is curtailed by the utility, for any reason;
    - 3) Anticipation and forecast of severe weather, where flight operations have identified a severe weather warning, or severe lightning storm, within 5 miles of the facility;
    - 4) Operation of the generators for the scheduled Operation and Maintenance, within the permitted number of runtime hours per year, as stipulated;

- 5) Other unanticipated emergencies, which are unable to be clearly identified, until they occur as an unpredicted and out-of-the-ordinary emergency.
- ii. The usage of the Emergency Generators for the reduction of electric charges, by suppling extra electric power to the facility, would not be considered an emergency. Emission Unit U6a will not be used for peaking purposes.
- b. The owner or operator shall limit the operating hours to no more than 3,000 hours per year total for all five emergency generators.

# 3. **Monitoring** (Regulation 2.16, Section 4.1.9.1.2)

- a. NO<sub>x</sub>
  - i. The owner or operator shall monitor the operation of these five (5) diesel-powered engines to demonstrate ongoing compliance with AC # 2.a.
  - ii. Additional compliance monitoring shall consist of the record keeping requirement specified in AC # 4.

# b. Opacity

- i. For each emergency generator, the owner or operator shall conduct a one (1) minute visible emission survey during the monthly preventive maintenance operation. The visible emission surveys shall be performed during normal operation and daylight hours after initial startup of the generators. Documentation of the visible emission surveys shall be maintained by the owner or operator of the emergency generators.
- ii. For each PM emission point, where visible emissions are observed, the owner or operator shall initiate corrective action within 8 hours of the initial observation. If the visible emissions persist, the owner or operator shall perform a Method 9 for stack emissions, during the next run period of the emergency generator. If the opacity standard is exceeded, the owner or operator shall report the exceedance to the District, pursuant to Regulation 1.07 and take all practicable steps to eliminate the exceedance. Any Method 9 test performed, shall meet the requirements of 40 CFR Part 60, Appendix A. Subsequent visible emission surveys shall be conducted as specified in 2.b.i.
- iii. If an emergency generator is not being operated during the monthly preventive maintenance operation, then no visible emission survey needs to be performed for that emergency generator and a negative declaration may be entered in the record. The owner or operator shall maintain sufficient records to verify the emission point was not being operated.

# 4. **Record Keeping** (Regulation 2.16, section 4.1.9.2)

- a. NO<sub>x</sub>
  - i. The owner or operator shall maintain the following records to demonstrate ongoing compliance with the terms and conditions for Emission Unit U6a:
    - 1) The total monthly gallons of fuel usage for each generator;
    - 2) The total monthly emissions of NO<sub>x</sub> for each generator;
    - 3) The number of total operating hours for each generator for each operating day; and
    - 4) The necessary information to verify the reason for each startup for each generator to demonstrate compliance with AC #2.

## b. Opacity

i. The owner or operator shall maintain records of the results of all visible emission surveys and tests. The visible emission survey records shall include the date and time of the survey, the name of the person conducting the survey, and whether or not visible emissions were observed. Any correction actions resulting from 2. b. iii. above shall be documented and records made available to the District upon request.

# 5. **Reporting** (Regulation 2.16, Section 4.1.9.3)

- a. NO<sub>x</sub>
  - i. The owner or operator shall include, at a minimum, the following information in the semi-annual compliance monitoring reports for NO<sub>v</sub>:
    - 1) Emission Unit/Point ID number;
    - 2) The beginning and ending date of the reporting period;
    - 3) The total hours of operation for each month in the reporting period;
    - 4) The total NO<sub>x</sub> emissions for each month in the reporting period; and
    - 5) A certification statement that each generator was operated in accordance with AC # 2.

## b. Opacity

- i. The owner or operator shall include, at a minimum, the following information in the semi-annual compliance monitoring reports for opacity:
  - 1) Emission Unit ID number and Stack ID number;
  - 2) The beginning and ending date of the reporting period;
  - 3) The date, time and results of each visible emissions survey conducted that resulted in visible emissions being observed. If no visible emissions were observed during the reporting period, the owner or operator may submit a negative declaration;

- 4) The date, time and results of each Method 9. If no Method 9 were performed during the reporting period, the owner or operator may submit a negative declaration; and
- 5) Description of any corrective action taken pursuant to AC # 3.b.ii.

Emission Unit U6b Description: Diesel Fuel Storage for Emergency Power Generators

# **Applicable Regulations:**

FEDERALLY ENFORCEABLE REGULATIONS			
Regulation	Title	Applicable Sections	
40CFR60, Subpart K <sub>b</sub>	Federal New Source Performance Standards for VOL Storage Vessels	60.110b, 60.111b, 60.112b & 116b	
7.12	Standards of Performance for New Storage Vessels for Volatile Organic Compounds	1, 2, 3, 4, 5, 7 & 8	

DISTRICT ONLY ENFORCEABLE REGULATIONS		
Regulation	Title	Applicable Sections
7.02	Federal New Source Performance Standards Incorporated by Reference	1.21

# **Allowable Emissions:**

Regulated Air Pollutant	Limit/Standard
VOC	See AC # 1.a.i

# **Components:**

<b>Emission Pt</b>	Description	Control ID
E21	Diesel Fuel Underground Storage Tank (UST) installed in 1988	Uncontrolled

# **Additional Conditions**

- 1. **Standards** (Regulation 2.16, section 4.1.1)
  - a. VOC (Regulation 7.12, Section 3)
    - i. Diesel fuel has a vapor pressure less that 1.5 psia, therefore, Emission Unit U6b is not currently subject to any emission or equipment standards.
- 2. **Monitoring** (Regulation 2.16, Section 4.1.9.1.2)
  - a. VOC
    - i. The owner or operator shall monitor the monthly throughput of diesel fuel.

- ii. Additional compliance monitoring shall consist of the record keeping requirement specified in AC # 3.c.i.
- 3. **Record Keeping** (Regulation 2.16, section 4.1.9.2)
  - a. VOC
    - i. The owner or operator shall maintain monthly records of diesel fuel throughput.
- 4. **Reporting** (Regulation 2.16, Section 4.1.9.3)
  - a. There are no semi-annual compliance monitoring reports for this emission unit.

#### **Permit Shield**

The owner or operator is hereby granted a permit shield that shall apply as long as the owner or operator demonstrates ongoing compliance with all conditions of this permit. Compliance with the conditions of this permit shall be deemed compliance with all applicable requirements of the regulations cited in this permit as of the date of issuance, pursuant to Regulation 2.16, section 4.6.1.

# **Alternative Operating Scenarios**

The owner or operator did not request to operate under any alternative operating scenarios in its Title V permit application.

#### **Off-Permit Documents**

There are no Off-Permit documents associated with the issuance of this permit.

SOURCE-WIDE HAP SPECIATION			
НАР	CAS No.	НАР	CAS No.
Benzene	71-43-2	Methyl tert-Butyl Ether	1634-04-4
Ethyl Benzene	100-41-4	Naphthalene	91-20-3
Hexane	110-54-3	Styrene	100-42-5
Methyl Ethyl Ketone	78-93-3	Toluene	108-88-3
Methyl Isobutyl Ketone	108-10-1	Xylene	1330-20-7

Note: HAPs cited in the table above are those currently known to be used at this plant and were identified in the permit application.

INSIGNIFICANT ACTIVITIES			
Description	Quantity	Basis	
Fuel burning equipment; 4 small boilers and 144 heaters, less than 10 MM Btu/hr capacity each	148	Exempt, Regulation 2.02, section 2.1.1	
Various internal combustion engines; emergency fire pumps, and power generators	1	Exempt, Regulation 2.02, section 2.2	

INSIGNIFICANT ACTIVITIES				
Description	Quantity	Basis		
Lubricant and fuel oil storage, with fluids having a vapor pressure less than 10 mm Hg at 20 deg C	20	Exempt, Regulation 2.02, section 2.3.9.2		
Brazing, soldering and welding equipment, used for this type of metal joining operation	1	Exempt, Regulation 2.02, section 2.3.4		
Dust collectors and fabric filters, which exhaust inside the building, with less than 1 TPY of PM	5	Exempt, Regulation 2.02, section 2.3.21		
Non-Halogenated cold solvent part degreasers, equipped with secondary reservoir for solvent. *	15	Exempt, Regulation 2.02, section 2.3.22		
Moveable fuel tanks with a capacity < 500 gallons, which are able to relocated on the premises.	10	Exempt, Regulation 2.02, section 2.3.23		
VOC storage vessels with a capacity < 250 gallons	10	Exempt, Regulation 2.02, section 2.3.24		
Fuel storage tanks for emergency generator use, with a throughput < twice the tank capacity. These are 150 gal day tanks located in the Utility Building.	5	Exempt, Regulation 2.02, section 2.3.25		
Fuel storage tanks for emergency generator use, with a throughput < twice the tank capacity. These are 50 gal day tanks for Ashbottom, Fuel Farm and Auxiliary.	3	Exempt, Regulation 2.02, section 2.3.25		
Oil-Water Separators (OWS) in use as BMP for stormwater and wastewater permits. OWS are exempt based on the low vapor pressure of Jet-A fuel.	16	Exempt, Regulation 7.36, Section 1		

1. Insignificant Activities are only those activities or processes falling into the general categories defined in District Regulation 2.02, Section 2, and not associated with a specific operation or process for which there is a specific regulation. Equipment associated with a specific operation or process (Emission Unit) shall be listed with the specific process even though there may be no applicable requirements. Information contained in the permit and permit summary shall clearly indicate that those items identified with negligible emissions have no applicable requirements.

- 2. Activities identified In District Regulation 2.02, Section 2, may not require a permit and may be insignificant with regard to application disclosure requirements but may still have generally applicable requirements that continue to apply to the source and must be included in the Title V permit.
  - \*a. Non-halogenated cold solvent parts cleaners shall be operated in compliance with all applicable sections of District Regulations 6.18 and 7.18, including Section 4 of each.
  - b. No facility, having been designated as an insignificant activity, shall be exempt from any generally applicable requirement which shall include a 20% opacity limit for facilities not otherwise regulated.
  - c. No periodic monitoring shall be required for facilities designated as insignificant activities.